

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JERRY PINNELL, JEREMY FERNANDEZ)
AND SHANE PERRILLOUX, individually)
and on behalf of all others similarly situated,)

Plaintiffs,)

v.)

TEVA PHARMACEUTICALS USA, INC.,)
BOARD OF DIRECTORS OF TEVA)
PHARMACEUTICALS USA, INC., TEVA)
PHARMACEUTICALS USA, INC.)
INVESTMENT COMMITTEE, and JOHN)
AND JANE DOES 1-30.)

Defendants.)

**CIVIL ACTION NO.:
2:19-CV-05738-MAK**

**PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Named Plaintiffs Jerry Pinnell, Jeremy Fernandez, and Shane Perrilloux (collectively, "Plaintiffs"), participants in the Teva Pharmaceuticals Retirement Savings Plan (the "Plan") hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting final approval to the class action settlement in this action on the terms of the Class Action Settlement Agreement ("Settlement Agreement"), executed on November 18, 2020 and previously filed with the Court on November 18, 2020 (ECF 68-3, 71-3);
2. Certifying the Class as defined in the Settlement Agreement;
3. Appointing Named Plaintiffs as Class Representatives and Plaintiffs' Counsel as Class Counsel under FED. R. CIV. 23(g);
4. Finding that the manner in which the Settlement Class was notified of the Settlement was the best practicable under the circumstances and adequately informed the

Settlement Class members of the terms of the Settlement, how to lodge an objection and obtain additional information; and

5. For such other and further relief as the Court may deem just and proper.

The grounds for this Motion are set forth in the following papers filed contemporaneously herewith:

A. Memorandum in support of Plaintiffs' Final Approval of Class Action Settlement; and

B. Declaration of Mark K. Gyandoh in support of Plaintiffs' Motion for Final Approval of Class Action Settlement and exhibits thereto.

Attached hereto is the proposed Final Approval Order and Judgment in the form agreed to by the parties and attached to the Settlement Agreement as Exhibit D. Further, the parties have conferred and respectfully request the May 3, 2021 Fairness Hearing be held telephonically or by video sharing service such as Zoom, as part of the COVID-19 mitigation efforts. If the Court grants this request, Class Counsel shall make this announcement on the Settlement Website as contemplated under paragraph 26 of the Preliminary Approval Order.

DATED: March 15, 2021

Respectfully submitted,

/s/ Mark K. Gyandoh

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